

**REMARKS/ARGUMENTS**

Claims 1-27 have been amended to correct obvious typographical errors and to better illuminate the present invention. No new matter has been added and, as will be clear from the below discussion, no claim has been amended in response to any of the present rejections or for any reason related to patentability. New claims 28-52 have been added herein. New claims 28-52 are directed toward computer program products for carrying out the method steps for constructing a database-driven website. Support for new claims 28-52 can be found throughout the specification and original claims including, for example, original claims 16, 17, 22 and 23.

Claims 1-52 are currently pending in the application. Claims 1, 10, 18, 24, 28, 37, 44 and 48 are independent claims.

**Background**

Applicants' inventions relate to methods and tools for constructing a website. Rather than websites that retrieve static pages, the inventions allow construction of a "database driven website" where each web page is stored as a database record having fields that reference various parameters, including, for example, a layout template and content. As noted in Paragraph [0006], pages within websites so constructed may then be displayed by retrieving the fields in the corresponding records, rather than static pages, to access, for example, the layout template and content records for display.

Although there are many software tools available for creating a website, the tools of the prior art produce websites using fixed web pages, which are stored as separate documents. One of the problems associated with storing these web pages as separate documents is that the HTML and other coding used for representing the links and various web page content must be duplicated for each web page, even if they reference or contain common subject matter. Thus, for example,

if content appearing on a plurality of pages is to be updated, each of those pages must be separately accessed and the content separately changed. In addition to wasting storage space, these prior art methods also make updating the website extremely tedious and provide for error.

In contrast, the present invention includes methods and software tools for preparing database-driven websites. Websites of the present invention is referred to as “database-driven” because web pages are defined by selecting various parameters for a web page and storing the parameters for that page as fields in a web page database record. Database records may be included within, for example, layout tables, page-type tables, web page tables, sub-page table, and content tables. See, *e.g.*, Figures 4A-4E and Paragraphs [0033] - [0038].

These web page database records have various fields that reference, for example, a layout template, a page-type and content, and are stored as separate database records. In accordance with the present invention, and advantageously, each web page in the website may then be displayed by using the various fields in the corresponding web page database record to access, for example, the layout template, page-type, and content database records for display of the web page, rather than accessing fixed stored web pages. The inventive method for constructing a website by storing web pages as database records offers numerous advantages over the prior art. See, for example, Paragraphs [0029] - [0032], which note that:

1. A user can create the organizational hierarchy of the website without specifying content;
2. When the content is specified, content which is common to several web pages is stored only once;
3. The code for creating and displaying page-types common across several web pages is stored only once; and

4. The layout, organization, and content of the website may be changed dynamically by updating the corresponding database records, rather than having to update each page individually.

Unlike prior art website creation software tools, the present invention does not store the pages of a website as separate, individual files. The invention eliminates the duplication of code throughout the various web pages, which reduces storage space. In accordance with the invention, parameters that are common to a plurality of web pages need only be stored once. All of the elements defining the web page, such as, for example, content, page layout, page-type, *etc.*, are stored and accessed from database tables. Therefore, when multiple web pages reference the same content, the content is not duplicated in each of the web pages, but rather is stored once in the database and accessed when each web page referencing the content is displayed. The same is true for the other fields in the web page database record, such as layout, page-type, *etc.*

None of the prior art cited by the PTO teaches or suggests these inventions, nor its advantages.

### **Cited Documents**

In support of its rejection of claims, the PTO cited three documents: U.S. Publication No. 2002/0103858 to Bracewell et al. ("Bracewell"); U.S. Publication No. 2004/0162750 to Motoyama ("Motoyama"); and Lemay, *Teach Yourself Web Publishing With HTML 4 in 14 Days* (1997) ("Lemay"). None of these documents relate in any meaningful way to the inventions claimed in the instant application.

Bracewell, entitled "Template Architecture and Rendering Engine for Web Browser Access to Databases," relates to a method for displaying data on a web browser where the data is not natively compatible for display on the web browser. It has nothing to do with constructing a

website. The method is designed “to facilitate more secure Web access to data that is not natively compatible with a Web browser . . . without extensive recoding” (Paragraph [0008]).

Bracewell’s method is useful, says the application, because existing products for “displaying a variety of data formats” leads to “inefficiency when accessing certain types of data” (Paragraph [0006]).

In other words, the Bracewell method is used to process data “not normally viewable on a Web browser” to “make it viewable” (Paragraph [0010]).

While the display of such non-compatible data in Bracewell is facilitated through use of what it refers to as a “template,” the Bracewell template is not the same as the “layout template” of the present invention. In Bracewell, after a network server receives a request for information the “template” associated with displaying the requested content for the particular web browser being used is determined. Such a determination is made from information included in the request, which allows the network server to identify what browser type and language the requested content should be returned in (Paragraph [0015]; emphasis added). After the network server creates the requested content from displayable and non-displayable content it sends the now-viewable content to the web browser (Paragraph [0017]).

Motoyama, entitled “Automated Management of Development Project Files Over a Network,” also has nothing to do with constructing a website. Rather, it is directed toward managing a development project schedule over a network (see Paragraphs [0001] and [0007]). Managing a development project schedule in Motoyama is based on automatic aggregation of individual task schedules. Based on inspection results, individual task schedules are automatically updated. According to the Motoyama application, the method is, in essence, an automation of prior manual techniques.

In addition to a method for “automatic aggregation of individual task schedules,” Motoyama also refers to use of “an online project initiation form” for managing project files, which triggers the creation of sites for each individual specified to contribute to the project, “where individual task schedules and draft project files can be linked to the individual site” (Paragraph [0008]). The method is useful, says Motoyama, because “development projects are inherently difficult to manage” and because, “[h]istorically, management of a master project schedule entails, among other tasks, manually entering data into a scheduling application, manually creating links between schedules, and manually aggregating individual developers' task schedules into the master project schedule,” and these are “cumbersome and errorprone [*sic*] tasks, with little to no oversight and quality control” (Paragraph [0003]).

According to Motoyama, his “automated techniques provide advantages over prior manual processes” (Paragraph [0009]).

Lemay (“*Teach Yourself Web Publishing With HTML 4 in 14 Days*”) is a book to help people teach themselves how to use HyperText Markup Language (HTML) to create a home page, present information on the web, or combine text, images, sound, and video in online web creations. HTML code is the major language of the Internet. Because HTML code files are plain text files, they can be composed and edited on any type of computer, and most websites and web pages are written in HTML code.

As noted in Figure 2.3, Lemay teaches providing an organizational hierarchy in a manner such that users can easily know their position within the website. The web pages contemplated in Lemay are the prior art static web pages, where each web page is stored as a preset, separate document in the file. Lemay includes no teaching or suggestion relating to creating and storing

web pages as database records as disclosed in the instant application, or storing various elements defining a web page as fields within web page database records.

None of Bracewell, Motoyama or Lemay relate in any meaningful way to the inventions claimed in the instant application.

**§ 103 Rejections – Claims 1-6, 10 and 16-17**

Claims 1-6, 10 and 16-17 stand rejected under § 103(a) over Bracewell in view of Motoyama. Applicants respectfully traverse these rejections for at least the following reasons.

First, as noted above, as opposed to prior art methods that prepare and retrieve static web pages, independent claims 1 and 10 are directed toward methods for constructing a database-driven website.

Second, neither Bracewell nor Motoyama are directed toward the construction of a website, let alone the construction of a database-driven website as disclosed and claimed in the instant application. Advantages of Applicants' claimed inventions over the prior art include those recited at page 10 above, and in Paragraphs [00029] - [0032] of the subject application, for example, none of which are found in Bracewell or Motoyama.

Third, the "template" of Bracewell has nothing to do with the "layout template" described in the instant application. As noted above, Bracewell is directed toward the display of data on a web browser where the data is not natively compatible with display on the web browser. According to Bracewell, display of such non-compatible data is facilitated through use of a "template." The Bracewell template, however, is different from the "layout template" of the present invention. According to Paragraph [0010] of Bracewell, a "template" is "used to define a web page including how data not normally viewable on a Web browser should be processed to make it viewable" (emphasis added). After a template is generated, says Bracewell, "it may be



associated with any number of language support files” (Paragraph [0011]) and provides “an efficient way to display data in a variety of languages” (Paragraph [0012]).

Fourth, Motoyama is also unrelated to Applicants’ inventions. As noted above, Motoyama is directed toward managing a project schedule for a development project based on automatic aggregation of individual task schedules. Individual task schedules are automatically rather than manually updated, with the individual task schedules linked to the associated project schedule.

In sum, neither Bracewell nor Motoyama relate to constructing a website and, whether taken alone or together, neither even vaguely teaches or suggests the inventions described and claimed in the instant application.

***Claim 1*** – With respect to independent claim 1, the PTO cites Bracewell Paragraphs [0013], [0016] and [0017] and alleges that they teach “storing each web page as a database record having fields that reference a layout template and content.”

To the contrary, these Paragraphs are not concerned with storing web pages as database records as disclosed and claimed in the subject application. Rather, it is proposed that the “template” associated with displaying the requested content for the particular web browser being used is determined after a network server receives a request for information. This determination is said to be made from information included in the request which allows the network server to identify what browser type and language the requested content should be returned in (Paragraph [0015]). After the data is retrieved, the network server attempts to construct the data, breaking it into displayable and non-displayable content and processing each separately. When the network server is able to create the requested content, it sends the requested content to the web browser (Paragraph [0017]).

In contrast, rejected claim 1 relates to construction of a website. It recites that at least one web page be created and stored as a database record having fields that reference a layout template and content. “Layout templates” are discussed, for example, in Paragraph [0019] of the specification:

[0019] The website creation application 12 provides multiple layout templates 28 to the user 16a for selection to aid in the construction of the website 22. Each layout template 28 defines locations for one or more navigational link areas, including a home page link area that display navigational links for navigating the website 22 [emphasis added].

Thus, while Bracewell uses the word “template,” this template is unlike the “layout template” of the present invention. Bracewell, furthermore, includes no teaching or suggestion regarding storing a web page as a database record in the manner described and claimed in the instant application, for example, having fields that reference the various parameters for a web page.

The PTO also alleges that Bracewell teaches “storing content as a database records,” citing item 213 of Fig. 2 and Paragraph [0013]. It does not. All computer-related technology includes data storage, and item 213 in Bracewell is merely a conventional data storage device (called a “data store” in Bracewell). The PTO has provided no rationale as to how or why it is believed that a recitation regarding a conventional “data store” could possibly be seen to teach storing the claimed layout template and content as database records separate from the web page database records, as recited in claim 1. Bracewell is not directed toward the creation of the website, and there is no teaching or suggestion in Bracewell of storing web page content as a database record according to the method of claim 1.

The PTO cites Paragraph [0017] of Bracewell as allegedly teaching “displaying each web page by using the fields in the corresponding database record to access the layout template and content record for display.” To the contrary, this paragraph merely refers to ways in which



displayable content, as well as non-displayable content, may be processed to create displayable content. As noted in Bracewell, Paragraph [0017], the non-displayable data may be used as input for one or more functions so that it may be converted into a format viewable using a web browser, or the non-displayable data may be intermixed with the already displayable portions to create the requested displayable content. There is no teaching or suggestion in Bracewell of utilizing the corresponding fields in the web page database record, namely layout template and content fields, to access the layout template and content database records for display of the web page, as recited in claim 1.

Acknowledging that Bracewell fails to disclose storing a layout template as a database record, the PTO cites Motoyama Paragraph [0051] and alleges that it contains this disclosure. It does not. Paragraph [0051] of Motoyama refers to “template forms.” Although, like Bracewell, this application also includes the word “template,” this does not make it relevant to Applicants’ claimed inventions. The “template forms” are merely the documents utilized by project participants, such as project initiation forms, inspection forms, manuals, and policies and procedures, “at least with respect to development projects.” As noted in Motoyama, the forms “facilitate the interactive input of information into the system database 106 and are primarily used by the clients, or individual project participants, and also define the printed outputs” (Paragraph [0051]). Plainly, Motoyama does not teach or suggest storing the claimed “layout template” as a database record in accordance with claim 1.

For at least these reasons, claim 1 is patentable over Bracewell and Motoyama, whether taken alone or in combination, and Applicants respectfully request that the rejection of claim 1 be reconsidered and withdrawn.

**Claim 10** – Independent claim 10 recites various steps utilized in the construction a database-driven website. As noted herein, neither Bracewell nor Motoyama are directed toward the creation of a website. Thus, neither Bracewell nor Motoyama disclose the various steps recited in the method of independent claim 10 for constructing a database-driven website in accordance with the present invention.

All of the recitations of Bracewell cited by the PTO are directed toward how to display non-displayable content that is not “native” to a web browser. None relate to creation of a website. Likewise, Motoyama, which is directed toward managing project files over a network, is also not concerned with the creation of a website. The PTO has imparted disclosure into these documents that is not found in either.

For example, citing Paragraphs [0065] and [0067], the PTO alleges that Bracewell teaches providing a plurality of application objects corresponding to a plurality of page-types for processing the page-types when invoked. However, this recitation of Bracewell merely discusses preparing requested displayable content by including displayable portions of an identified template in the requested content. This recitation further refers to the storage of localized data for a language in files that are external to the code of the engine, which is said to allow the rendering process to function more efficiently. There is no teaching or suggestion in Bracewell of providing a plurality of application objects corresponding to a plurality of page-types for processing web pages corresponding to the page-types when invoked, as recited in claim 10.

The PTO also cited item 213 in Fig. 2 of Bracewell as allegedly teaching storing each web page, and Paragraph [0017] of Bracewell as allegedly teaching displaying one of the web pages on a client computer by invoking the application object indicated in the page-type fields in each of the web page records to present the corresponding content to the client computer. It does

not, however. As previously noted, item 213 in Bracewell is merely a conventional data storage, and the PTO has not pointed to any teaching in Bracewell which instructs or suggests the claimed feature of storing each web page as a database record and storing the corresponding parameters as fields in the web page database record. Additionally, as previously noted, Paragraph [0017] of Bracewell merely refers to ways in which displayable content, as well as non-displayable content, is said to be processed to create displayable content for the web browser requesting such display. Bracewell does not teach displaying web pages on the client computer by invoking the application object corresponding to the page-type field in the corresponding web page database record to present the corresponding content to the client computer, as recited in claim 10.

Citing Paragraphs [0037], [0040], and [0049] - [0053], the PTO also alleges that Motoyama discloses storing parameters as fields in a data record and allowing the user to create one or more web pages for the website for specifying parameters for each of the web pages, wherein the parameters include the page-type of the web page and the content to be displayed in the web page. However, Paragraph [0037] of Motoyama simply discusses the connection of a conventional database for storing information and providing access to the information by authorized individuals at workstations or web servers. Paragraph [0051], as previously noted, merely teaches actual word document forms utilized by “project participants,” such as project initiation forms, inspection forms, manuals, policies and procedures. Paragraphs [0040] and [0049] - [0053] of Motoyama simply describe a computer system utilized in Motoyama.

While Paragraph [0052] of Motoyama states that web page files may be stored as project data, these web page files are prior art static web pages, and not the database-driven web page files of the present invention. The portions of Motoyama cited by the PTO include no teaching or suggestion about allowing a user to create one or more web pages for a website by specifying

parameters for the one or more web pages, wherein the parameters including the page-type of the web page and the content to be displayed in the web page, and storing the corresponding parameters as fields in the web page database record(s), as recited in claim 10.

For at least these reasons, claim 10 is patentable over Bracewell and Motoyama, whether viewed alone or in combination.

In light of the above discussion, and as a matter of law, it is equally plain that none of the rejections of the dependent claims, which contain further limitations in addition to those of the independent claims 1 and 10, can stand. Nevertheless, each of these dependent claim rejections is further addressed below.

**Claim 2** – Dependent claim 2 states that the method of claim 1 further includes the step of “allowing a user to specify a page-type for each web page stored as a database record from among a plurality of page types.” The PTO alleges that Paragraphs [0049] - [0053] of Bracewell teaches a “similar” step with regard to a user who “specifies electronic mail as the type of page to use” (December 2, 2004 Office Action, page 3). While the PTO states that the rejection of claim 2 incorporates the rejection of claim 1, there is no specific statement indicating why the PTO believes Paragraphs [0049] - [0053] of Bracewell serve to support a *prima facie* case of obviousness within the meaning of 35 U.S.C. § 103.

In any event, no *prima facie* case can be found. Bracewell merely discusses the process involved in allowing users to view their electronic mail in-box using a network device. In this process, the browser type, and not a page type, is included in the request from the user. The browser type is dependent upon the particular browser used by the network device.

In contrast, the step recited in claim 2, allowing a user to specify a page-type for each web page stored as a database record from among a plurality of web pages is performed while the user

is creating a web page. Bracewell is not concerned with the creation of web pages. Thus, claim 2 is also allowable over the alleged art cited by the PTO, and Applicants respectfully request that this rejection be reconsidered and withdrawn.

**Claim 3** – Dependent claim 3 (which depends from claim 2) specifies that the method further includes the step of “storing the specified page type as a field in the corresponding database record for the web page.” At page 3 of the December 2, 2004 Office Action, the PTO alleges that Motoyama discloses storing information as a field in a record at Paragraph [0037]. Although incorporating the rejection of claim 2, the Office Action does not contain a specific statement indicating why the PTO believes this paragraph supports a *prima facie* case of obviousness within the meaning of 35 U.S.C. § 103. Indeed, it cannot. This recitation of Motoyama simply refers to the storage of information in general on a conventional database. There is no teaching or suggestion in Motoyama of “storing the specified page type as a field in the corresponding database record for the web page,” as indicated in claim 3. Thus, claim 3 is also allowable, and Applicants respectfully request that this rejection be reconsidered and withdrawn.

**Claim 4** – Dependent claim 4 (which depends from claim 3) specifies that the method further comprises “providing an application object for each respective page type for processing web pages corresponding to the page-types when invoked.” The PTO alleges that Bracewell teaches a similar step at Paragraphs [0065] and [0067], namely, “the step of constructing the displayable content” being “the processing step” where, the PTO further alleges, “support for processing several different languages is also included” (December 2, 2004 Office Action, page 4). There is no statement indicating how these citations allegedly serve to establish a *prima facie* case of obviousness within the meaning of 35 U.S.C. § 103.

Applicants respectfully submit that they do not. As previously noted, this recitation of Bracewell simply discusses constructing the requested displayable content by including displayable portions of an identified template in the requested content. According to Bracewell, localized data for a language is stored in files that are external to the code of the rendering engine and templates, allegedly allowing the rendering process to function more efficiently.

Nowhere does Bracewell teach or suggest providing an application object for each respective page type for processing web pages corresponding to the page-types when invoked. Thus, claim 4 is also allowable, and Applicants respectfully request that this rejection be reconsidered and withdrawn.

**Claim 5** – Dependent claim 5 (which depends from claim 4) specifies the further step: “when displaying the web page, accessing the page type field in the corresponding web page database record and invoking the corresponding application object to display the web page.” The PTO alleges that Paragraphs [0049] - [0053], [0065] and [0067] of Bracewell teach a “similar step” because they “detail accessing the page type and the application for displaying the web page” (December 2, 2004 Office Action, page 4). As with dependent claims 2-4, there is no statement indicating how these citations allegedly serve to establish a *prima facie* case of obviousness within the meaning of 35 U.S.C. § 103.

Applicants respectfully submit that they do not. These recitations of Bracewell have been previously discussed with respect to claims 2 and 4. They discuss the process involved in allowing a user to view their electronic mail in-box using a network device, and constructing the requested displayable content by including displayable portions of an identified template in the requested content. Bracewell does not teach or suggest any type of page-type field and corresponding application object utilized to display web pages, as recited in claim 5, and claim 5



is allowable over the cited documents. Applicants respectfully request that this rejection be reconsidered and withdrawn.

**Claim 6** – Dependent claim 6 (which depends from claim 5) states, “the page-types comprise application page-types and content page-types.” The PTO alleges that Bracewell teaches, at Paragraphs [0065], [0067] and item 213 of Fig. 2, “application page-types” and the storage of “content page-types” (December 2, 2004 Office Action, page 4). As noted above, item 213 is a conventional data storage, and Paragraphs [0065] and [0067] simply discuss constructing requested displayable content by including displayable portions of an identified template.

There is no statement indicating how these matters allegedly serve to establish a *prima facie* case of obviousness within the meaning of 35 U.S.C. § 103. Indeed, Bracewell does not teach page-types in general, let alone that page-types can comprise application page-types (e.g., calendar, calculator, web mail, catalog, guest book, etc.) and content page-types, as recited in claim 6. Thus, claim 6 is also allowable, and Applicants respectfully request that this rejection be reconsidered and withdrawn.

**Claim 16** – Dependent claim 16 (which depends from independent claim 10) further includes the step of “providing a software tool for allowing the user to construct the website.” The PTO alleges that Paragraph [0065] of Bracewell teaches the step of providing a software tool for allowing the user to construct a website (December 2, 2004 Office Action, page 6). There is no statement indicating how these matters allegedly serve to establish a *prima facie* case of obviousness within the meaning of 35 U.S.C. § 103. However, as the PTO admits, this recitation of Bracewell merely relates to constructing “displayable content” that is already stored in the data server. This is clearly not the same as providing a software tool allowing the user to construct a

website. Claim 16 is also allowable over the cited documents, and Applicants respectfully request that this rejection be reconsidered and withdrawn.

**Claim 17** – Dependent claim 17 (which depends from independent claim 16) further includes the step of “implementing the software tool as a web application running on a server that allows the user to construct the website using a web browser.” Again citing Paragraph [0065] of Bracewell, but without explanation, the PTO alleges that it teaches such a step. The PTO does not discuss how this Paragraph might allegedly serve to establish a *prima facie* case of obviousness within the meaning of 35 U.S.C. § 103 (December 2, 2004 Office Action, page 6). In any event, the deficiencies of this Paragraph of Bracewell have been fully discussed above. Paragraph [0065] merely references preparing displayable content already stored in a data server. This is clearly not the same as providing a software tool as a web application running on a server that allows the user to construct a website using a web browser. Claim 17 is also allowable, and Applicants respectfully request that this rejection be reconsidered and withdrawn.

For at least the above-identified reasons, Applicants submit that claims 1-6, 10 and 16-17 are allowable over Bracewell in view of Motoyama, and respectfully request withdrawal of each rejection.

### **§ 103 Rejections – Claims 7-9, 11-15 and 18-27**

Claims 7-9, 11-15 and 18-27 were rejected under § 103(a) over Bracewell in view of Motoyama and further in view of Lemay. Applicants respectfully traverse these rejections for at least the following reasons.

Various deficiencies of Bracewell and Motoyama have been previously discussed. As noted, neither Bracewell nor Motoyama teach or suggest the storing of web pages as database

records, with corresponding parameters for the web pages stored as field in the database records.

Each of independent claims 1, 10, 18 and 24 includes this limitation.

The PTO has taken isolated teachings from Bracewell and Motoyama, which are not in any way directed toward the construction of a website, and attempted to read into these documents claim limitations that are simply not there. These isolated teachings have been discussed above, and Applicants will not burden the PTO by reiterating their previous arguments.

While Lemay relates to constructing a website, Lemay teaches prior art methods of constructing a web site using static web pages, the present invention being a manifest improvement over such prior art methods.

For example, the organizational hierarchy disclosed in Lemay at page 33, Fig. 2.3, illustrates the prior art static web page construction with each web page stored as a separate document. The same is true for the other organizational illustrations in Lemay and that are shown, for example, at Figs. 2.7, 2.8, 2.11, 2.13, 2.16 and 29.10.

The teachings of Lemay are directed toward how to set up the organization of a website. The Figures of Lemay referenced above all illustrate different organizational schemes in setting up a website. Lemay discusses the various organizational schemes and the various benefits and deficiencies of each. For example, the various organizational schemes taught in Lemay include hierarchical (Fig. 2.3), linear (Fig. 2.7), linear with alternatives (Fig. 2.8), combination of linear and hierarchical (Fig. 2.11), web structure (Fig. 2.13), complex storyboard (Fig. 2.16), and a confused set of web pages (Fig. 29.10). Lemay is directed toward the navigational aspects of a website; in other words, how easy or difficult it is for a user to navigate through a website.

Lemay is totally devoid of any teaching or suggestion of creating a website by storing the web pages as database records with fields that reference various parameters for the web page.

While Lemay relates to putting together a web page, it teaches the prior art method of storing each web page as a separate file. Because Lemay is directed toward the prior art “fixed page” method, Lemay cannot cure any of the deficiencies previously recited with respect to Bracewell and Motoyama.

None of the documents cited by the PTO remotely teach or suggest the database-driven website inventions claimed by Applicants and, for at least the reasons discussed herein, claims 7-9, 11-15 and 18-27 submitted to be allowable over the prior art. Reconsideration and withdrawal of these rejections is respectfully requested.

### **New Claims 28-52**

New claims 28-52 are directed toward computer program products for carrying out methods for constructing a database-driven website. New claims 28-52 recite methods similar to those of claims 1-27. Thus, for at least the reasons discussed herein, new claims 28-52 are submitted to be allowable over the cited documents.

### **Conclusion**

None of the alleged references disclose or suggest constructing a database-driven website by storing each web page as a database record having fields that reference a layout template and content, and storing the layout template and the content as separate database records. This is a distinct improvement over the prior art, where static web pages are stored with each page being a separate document. This requires that the HTML and other codes for representing the links and content on the web pages be duplicated on each web page that references common content.

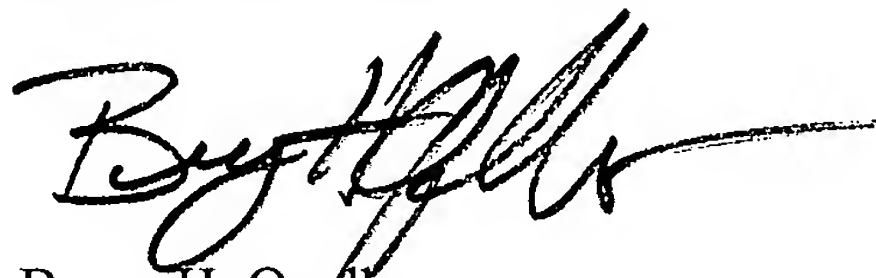
By allowing each web page to be stored as a database record having fields that reference a layout template and content, each web page in the website may then be displayed by retrieving

the fields in the corresponding records to access the layout template and content records for display.

There is no teaching or suggestion in the prior art of Applicants' novel method of constructing a database-driven website. Accordingly, Applicants submit that pending claims 1-52 are allowable over the prior art. Reconsideration of pending claims 1-52, allowance and passage to issue, are respectfully requested.

Applicants believe this Response requires an extra claims fee of \$1,025.00. The Commissioner is hereby authorized to charge this fee, and any other fees that may be due in connection with this Response, to Deposit Account No. 02-4553.

Respectfully submitted,



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